

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA  
NORTHERN DIVISION**

Case No.: 23-315

JUDSON COLLEGE; JOAN VIGNES	)
NEWMAN; JUDITH KAREN FAVOR;	)
DAPHNE RUDICELL ROBINSON; and	)
JOSEPH WILLIAM "BILL" MATHEWS,	)
JR.,	)
	)
Plaintiffs,	)
	)
v.	)
	)
INDIAN HARBOR INSURANCE CO.,	)
KEN GOFORTH; and USI INSURANCE	)
SERVICES,	)
	)
Defendants.	)
_____	)

**CONSENT TO REMOVAL**

Defendant Ken Goforth and USI Insurance Services, LLC, through undersigned counsel, hereby consent to and join the Notice of Removal filed by Indian Harbor Insurance Company in the above-captioned matter.

Respectfully submitted,

/s/ David W. McDowell

DAVID W. MCDOWELL

MAIA FLEISCHMAN

Attorneys for Defendants USI Insurance  
Services, LLC and Ken Goforth

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